

**NO. 2019-61060**

**DONALD B. JOHN-MILLER,  
INDIVIDUALLY AND D/B/A  
EDAM GBERE INTERNATIONAL  
SERVICES,  
EDAM GBERE NIGERIA LIMITED,  
D1 INTEGRATED SERVICES,  
and,  
CAROLINE MARINE SERVICES, LTD.**

**IN THE DISTRICT COURT  
165TH JUDICIAL DISTRICT  
HARRIS COUNTY, TEXAS**

**vs.**

**AUSTIN HOWELL, INDIVIDUALLY,  
TIDEWATER MARINE  
INTERNATIONAL, INC., and  
TIDEWATER MARINE, LLC**

**NOTICE OF FILING NOTICE OF REMOVAL TO FEDERAL COURT**

**TO: The Honorable Marilyn Burgess  
District Clerk of Harris County  
201 Caroline, Suite 420  
Houston, Texas 77002**

Plaintiff, Donald B. John-Miller, individually and D/B/A Edam Gbere International Services, Edam Gbere Nigeria Limited, D1 Integrated Services, and Caroline Marine Services, Ltd.

*Through Plaintiff's counsel of record*  
Toby C. Easley  
EASLEY LAW FIRM, PLLC  
1214 Elgin Street  
Houston, Texas 77004

**EXHIBIT  
C**

**PLEASE TAKE NOTICE** that on the 30th day of September, 2019, Defendant, Tidewater Marine, LLC, pursuant to 28 U.S.C. § 1332, 28 U.S.C. § 1441 and 28 U.S.C. § 1446, filed with the office of the Clerk of the United States District Court for the Southern District of Texas, a Notice of Removal of the above referenced and numbered action now pending in the 165th Judicial District Court for Harris County, bearing Civil Action No. 2019-61060.

A copy of said Notice of Removal filed with the United States District Court for the Southern District of Texas is attached hereto as Exhibit "A" and has been served on all counsel of record.

Respectfully submitted,

/s/ JUSTIN QUIN  
Justin P. Quin (TX Bar #24103893)  
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*Counsel for Defendant,  
Tidewater Marine, LLC*

**CERTIFICATE OF SERVICE**

I, the undersigned attorney, certify that on this 30th day of September, 2019, I served a true and complete copy of the foregoing pleading on all counsel by E-mail, facsimile, and/or by depositing same in the United States Mail, postage prepaid.

/s/ JUSTIN QUIN  
JUSTIN P. QUIN